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9 UNITED STATES DISTRICT COURT  
10 EASTERN DISTRICT OF CALIFORNIA  
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14 SARAH AMY FARAH WADE,  
15 Plaintiff,  
16 v.  
17 KILOLO KIJAKAZI,  
18 Acting Commissioner of Social Security,  
19 Defendant.

No. 1:22-cv-00752-BAM

STIPULATION TO VOLUNTARY REMAND  
PURSUANT TO SENTENCE FOUR OF  
42 U.S.C. § 405(g) AND TO ENTRY OF  
JUDGMENT; ~~PROPOSED~~ ORDER

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21 IT IS HEREBY STIPULATED, by and between the parties, through their undersigned  
22 attorneys, and with the approval of the Court, that the Commissioner of Social Security has  
23 agreed to a voluntary remand of this case pursuant to sentence four of 42 U.S.C. § 405(g). The  
24 purpose of the remand is to offer Plaintiff a new decision.

25 On remand, the Commissioner will further develop the record as necessary, offer the  
26 claimant the opportunity for a new hearing and issue a new decision. The parties further request  
27 that the Clerk of the Court be directed to enter a final judgment in favor of Plaintiff, and against  
28 Defendant, reversing the final decision of the Commissioner.

Stip. to Remand

1 Respectfully submitted this 8th day of May, 2023.

2 Respectfully submitted,

3 PHILLIP A. TALBERT  
4 United States Attorney

5 By: s/ Oscar Gonzalez de Llano  
6 OSCAR GONZALEZ DE LLANO  
7 Special Assistant United States Attorney  
8 Attorneys for Defendant

9 NEWEL LAW

10 By: /s/ \*Melissa Newel  
11 Melissa Newel  
12 Attorneys for Plaintiff  
13 (\*as authorized by email)

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Stip. to Remand

**ORDER**

Based upon the parties' Stipulation to Voluntary Remand Pursuant to Sentence Four of 42 U.S.C. § 405(g) and to Entry of Judgment ("Stipulation to Remand"), and for cause shown, IT IS ORDERED that the above-captioned action is remanded to the Commissioner of Social Security for further proceedings consistent with the terms of the Stipulation to Remand. The Clerk of the Court shall enter a final judgment in favor of Plaintiff, and against Defendant, reversing the final decision of the Commissioner.

IT IS SO ORDERED.

Dated: May 9, 2023

/s/ Barbara A. McAuliffe  
UNITED STATES MAGISTRATE JUDGE

Stip. to Remand